

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

BRAINTECH, INC., a Nevada corporation,

Plaintiff,

Case No. 2:09-cv-10454-VAR-VMM

v.

Hon. Victoria A. Roberts

ADIL SHAFI, an Individual,

Defendant/Counter-Plaintiff,

v.

FREDERICK WEIDINGER, an Individual,

Additional Counter Defendant.

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**INITIAL DISCLOSURES PURSUANT TO RULE 26(a)**

Defendant, Adil Shafi, through his attorneys, Berry Moorman P.C., hereby submits the following Rule 26(a) initial disclosures.

**I. THE DISCLOSURE OF INDIVIDUALS WITH KNOWLEDGE AND INFORMATION  
AND SUBJECTS OF SAID INFORMATION.**

1. Adil Shafi. Mr. Shafi is familiar with all aspects of the claim including all of the allegations set forth in the Second Amended Counterclaim. Mr. Shafi was the principal of Shafi Inc. and Shafi Innovation Inc. in connection with the negotiations leading up to the August 12, 2008 closing in which Braintech acquired all of the stock of Shafi Inc. and 80 percent of the stock

- C. Email exchange by Peter Long, Esq. on the one hand and agents and representatives of Braintech on the other hand.
- D. Business records of Will Tishkoff, Esq.
- E. Business records of Shafi Inc.

Note: Most of the foregoing categories of documents are also available in electronic format.

### III. COMPUTATION OF DAMAGES

A. Lost going concern value of Shafi Inc.	\$900,000
B. Breach of employment agreement (approx.)	\$700,000
C. Personal liability for Shafi debt (approx.)	\$250,000
D. Lost opportunity cost and damage to reputation as a result of Braintech's actions	\$500,000

### IV. INSURANCE AGREEMENTS

Shafi knows of no insurance coverage which would be available for any claims asserted against him in this matter.

Respectfully submitted,

BERRY MOORMAN P.C.

By: s/James P. Murphy  
James P. Murphy (P36728)  
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Dated: July 30, 2009

**CERTIFICATE OF SERVICE**

I hereby certify that on July 30<sup>th</sup>, 2009, I J. P. Murphy, being first duly sworn, served Initial Disclosures Pursuant To Rule 26(a) and Proof of Service of same, via email, upon:

James D. VandeWyngearde  
Pepper Hamilton LLP  
Attorneys for Plaintiff  
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Respectfully submitted,

BERRY MOORMAN P.C.

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Dated: July 30, 2009